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8 Attorneys for Plaintiffs Holly Monique Coons and Jaxon L. Medina-Coons

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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 FOR THE COUNTY OF VENTURA

13 HOLLY MONIQUE COONS;
14 JAXON L. MEDINA-COONS, a minor
15 by and through his Guardian Ad Litem,
16 HOLLY MONIQUE COONS;

17 Plaintiffs,

18 v.

19 ANTHONY PAUL WARGACKI;
20 and DOES 1 through 100, Inclusive,

21 Defendants.

CASE NO.

COMPLAINT FOR PERSONAL
INJURIES

22 Plaintiffs Holly Monique Coons and Jaxon L. Medina-Coons allege:

23 1. At all times herein mentioned, plaintiff Holly Monique Coons was
24 and is a competent adult and Jaxon L. Medina-Coons was and is a minor residing in the
25 City of Simi Valley, County of Ventura, California.

26 2. At all times herein mentioned, defendant Anthony Paul Wargacki
27 was and is a natural person residing in the City of Simi Valley, County of Ventura,
28 California.

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1 3. The true names and capacities of the defendants sued herein as
2 Does 1 through 100, inclusive, are unknown to plaintiffs who therefore sue said
3 defendants by such fictitious names. Plaintiffs Holly Monique Coons and Jaxon L.
4 Medina-Coons are informed and believe and thereon allege that each of the defendants
5 herein designated as a Doe is legally responsible in some manner for the events and
6 happenings herein referred to and caused injury and damages to plaintiffs as herein
7 alleged.

8 4. At all times alleged herein each defendant was the agent and
9 employee of each of his codefendants, and in doing the things herein described was
10 acting within the scope of his authority as such agent and employee.

11 5. At all times material herein Presidential Drive was and is a public
12 highway in the City of Simi Valley, County of Ventura, State of California.

13 6. On or about October 04, 2019, plaintiff Holly Monique Coons was
14 the driver of a vehicle and Jaxon L. Medina-Coons was a passenger in that same
15 vehicle on Presidential Drive at or near its intersection with Madera Road, and at the
16 same time and place defendants, and each of them, so negligently owned, controlled,
17 repaired, entrusted, maintained and operated an automobile as to cause it to, and it did,
18 become involved in an accident or collision, injuring and damaging plaintiffs as herein-
19 after described.

20 7. At all times set forth herein defendants, and each of them, were the
21 owners of their aforementioned automobile, and at all times herein referred to said
22 vehicle was being used and operated with the knowledge and consent of said owners.

23 8. As a cause of said conduct of defendants, and each of them,
24 plaintiffs sustained personal injuries which caused and will continue to cause pain,
25 discomfort and physical disability to plaintiffs, general damage in an amount according
26 to proof which in good faith is believed to be an amount within the jurisdictional limits of
27 this court.

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1 9. As a further cause of said conduct of defendants, and each of
2 them, plaintiffs employed and will employ in the future physicians, surgeons and others
3 for examination, treatment and care, and thereby incurred and will incur medical and
4 incidental expense, the exact amount of which is unknown at this time and plaintiffs will
5 offer proof thereof at the time of trial.

6 10. As a further cause of the above-described conduct of defendants,
7 and each of them, the aforementioned automobile of plaintiffs was damaged and
8 depreciated so that repairs were necessary, the reasonable costs of repairs or the
9 amount of depreciation being unknown at this time, and plaintiffs will offer proof thereof
10 at the time of trial.

11 11. As a further cause of said conduct of defendants, and each of
12 them, plaintiffs lost the use of said automobile for a period of time; that the reasonable
13 value of said loss of use of said automobile is unknown to plaintiffs at this time and
14 plaintiffs will offer proof thereof at the time of trial.

15 12. At the time of the described improper conduct of defendants, and
16 each of them, plaintiff Holly Monique Coons was gainfully employed for compensation,
17 and as a further cause of defendants' conduct, and each of them, plaintiffs have been
18 and in the future will be deprived of earnings, the exact amount of which is unknown at
19 this time, and plaintiffs will offer proof thereof at the time of trial.

20
21 WHEREFORE, judgment is prayed for against defendants, and each of
22 them, as follows:

- 23 1. General damages according to proof;
24 2. Medical and related expenses, past and future, according to proof;
25 3. Loss of earnings, past and future, in a sum according to proof;


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4. Loss of income from impaired earning capacity, past and future, according to proof;
5. Property damage in a sum according to proof;
6. Loss of use of automobile in a sum according to proof;
7. For prejudgment interest pursuant to Civil Code §3291;
8. Costs of suit incurred herein; and
9. For such other relief as may be appropriate.

Dated: September 29, 2020



RAQUEL CRUZ, A Member of
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Attorneys for Plaintiffs Holly Monique Coons and
Jaxon L. Medina-Coons